

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**GRAPHIC ARTS MUTUAL INSURANCE
COMPANY**

Plaintiff,

Civil Action No. 06-246-JJF

V.

INDIAN RIVER SCHOOL DISTRICT, *et al.*

Defendants.

JOINT MOTION TO EXTEND DEADLINES

Plaintiff Graphic Arts Mutual Insurance Company (“Graphic Arts”) and Defendants Indian River School District, Indian River School Board, Harvey L. Walls, Mark A. Isaacs, John M. Evans, Richard H. Cohee, Gregory A. Hastings, Nina Lou Bunting, Charles M. Bireley, Donald G. Hatier, Reginald L. Helms, M. Elaine McCabe, Lois M. Hobbs, and Earl J. Savage (collectively “IRSB”), by counsel, move this Court to enter the attached order, pursuant to Paragraph 4(g) of the Rule 16 Scheduling Order.

Graphic Arts filed this action to, *inter alia*, determine its rights and obligations under the insurance contract for the *Dobrich* Action. IRSD filed a counter-claim alleging breaches and anticipatory breaches of the insurance contract. Graphic Arts and IRSD now request, by this Motion, an extension of the currently pending deadlines to allow for meaningful settlement discussions and to allow for additional time to complete discovery.

Specifically, the parties request an extension of the deadlines for fact discovery, producing expert reports, amendment of pleadings, dispositive motions, and the pre-trial conference as follows:

- Reports from retained experts required by Fed. R. Civ. P. 26(a)(2) are due from the plaintiff(s) by December 19, 2008; from the defendant(s) by January 16, 2009;
- All motions to amend the pleadings shall be filed on or before August 29, 2008;
- All fact discovery must be completed by November 28, 2008 and all expert discovery must be completed by February 20, 2009;
- Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before March 13, 2009. Briefing shall be pursuant to D. Del. LR 7.1.2
- A pretrial conference as scheduled by the Court, on or after March 13, 2009.

WHEREFORE, Graphic Arts and IRSB respectfully request that this Court enter the attached Order.

Dated: July 15, 2008

Respectfully submitted,

/s/ Warren Pratt

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STIPULATED ORDER

And now, on this ____ day of July, 2008, upon consideration of the parties joint request, it is hereby ORDERED and DECREED as follows:

- Reports from retained experts required by Fed. R. Civ. P. 26(a)(2) are due from the plaintiff(s) by December 19, 2008; from the defendant(s) by January 16, 2009;
- All motions to amend the pleadings shall be filed on or before August 29, 2008;
- All fact discovery must be completed by November 28, 2008 and all expert discovery must be completed by February 20, 2009;
- Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before March 13, 2009. Briefing shall be pursuant to D. Del. LR 7.1.2
- A pretrial conference as scheduled by the Court, on _____ at _____.

Judge Joseph J. Farnan, Jr.